

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
Docket No.: 12591-PBS**

CONVERSE, INC.,

Plaintiff,

v.

ALON INTERNATIONAL, S.A.,

Defendant.

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**DEFENDANT ALON INTERNATIONAL, S.A.'S
UNOPPOSED MOTION TO ADMIT PAUL A. CAPUA PRO HAC VICE**

Defendant Alon International, S.A. ("Alon"), pursuant to Local Rule 83.5.3(b), hereby submits this Motion to Admit Paul A. Capua *Pro Hac Vice* as counsel in the above styled matter. In support of its Motion, Alon submits the Certificate of Paul A. Capua, attached hereto as Exhibit "A" and Certificate of Good Standing from the Florida Bar, attached hereto as Exhibit "B." In further support of this Motion, Alon states as follows:

1. Mr. Capua is an associate with the law firm of Astigarraga Davis Mullins & Grossman, P.A., located at 701 Brickell Avenue, Miami FL 33131.
2. Mr. Capua is an attorney licensed to practice law in the State of Florida and has been a member in good standing of the Florida Bar since 1995.
3. Mr. Capua is also admitted to practice before the United States Courts of Appeals for the Eleventh Circuit and the District Court for the Southern District of Florida.
4. Mr. Capua certifies that he is a member in good standing in every jurisdiction where he has been admitted to practice. Mr. Capua certifies that no disciplinary proceedings are pending against him as member of the bar in any jurisdiction.

5. Mr. Capua further certifies that he is familiar with and shall be governed by the local rules of this Court.

6. Cynthia D. Vreeland, Esq. and Richard A. Johnston Esq. of the law firm of Wilmer Cutler Pickering Hale and Dorr, LLP, 60 State Street, Boston, Massachusetts 02109, are members of the Massachusetts Bar in good standing and are the Massachusetts lawyers whom will act as local counsel for Defendant Alon in this action.

7. On May 31, 2005, counsel for Alon communicated with counsel for Converse, and Converse does not object to the admittance of Mr. Capua *pro hac vice* in this matter.

WHEREFORE, Defendant Alon respectfully requests that Paul A. Capua, of the law firm of Astigarraga Davis Mullins & Grossman, P.A. be admitted to appear *pro hac vice* before this Honorable Court in this action.

Dated this 31st day of May 2005.

Respectfully submitted,

/s/ Richard A. Johnston

**WILMER CUTLER PICKERING
HALE AND DORR, LLP**

Richard A. Johnston, Cynthia D. Vreeland
60 State Street
Boston, Massachusetts 02109
Telephone: (617) 526-6000
Facsimile: (617) 526-5000

Counsel for Defendant Alon International, S.A.

EXHIBIT “A”

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Docket No.: 12591-PBS

CONVERSE, INC.,

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ALON INTERNATIONAL, S.A.,

Defendant.

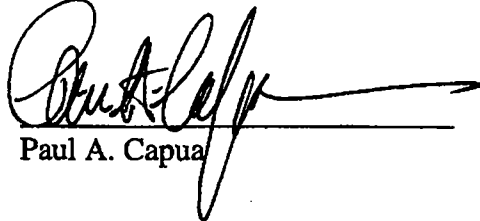
**CERTIFICATE OF PAUL A. CAPUA IN SUPPORT DEFENDANT
ALON INTERNATIONAL, S.A.'S *UNOPPOSED* MOTION
TO ADMIT PAUL A CAPUA *PRO HAC VICE***

I, Paul A. Capua certify that the following information is true and correct:

1. I am an associate of the law firm of Astigarraga Davis Mullins & Grossman, P.A., located at 701 Brickell Avenue, 16th Floor, Miami, Florida 33131.
2. I am a member in good standing of the Bar of the State of Florida, the United States District Court for the Southern District of Florida and the Court of Appeals for the Eleventh Circuit.
3. I have never been denied admission to, nor have I ever been disciplined in any court of any jurisdiction.
4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.
5. I respectfully request permission to appear before this Court *pro hac vice*

to represent the interests of Defendant Alon International, S.A. in this action.

Under penalties of perjury pursuant to 28 U.S.C. § 1746 and section 92.525 of the Florida Statutes, I declare that I have read the foregoing and that the facts stated herein are true and correct.



Paul A. Capua

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EXHIBIT “B”



The Florida Bar

JOHN F. HARNESSE, JR.
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET
TALLAHASSEE, FLORIDA 32398-2300

850/561-5600
www.FLABAR.org

State of Florida)

County of Leon)

In Re: 68500
Paul Augustus Capua
Astigarraga Davis
701 Brickell Ave. Fl. 16
Miami, Florida

C I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

O
P I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on November 22, 1995.

Y I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 26 day of May, 2005.

Willie Mae Shepherd
Supervisor, Membership Records
The Florida Bar

WMS/mlH6:R10

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Case No.: 04-12591-PBS

CONVERSE, INC.,

Plaintiff,

v.

ALON INTERNATIONAL, S.A.,

Defendant.

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ORDER AUTHORIZING ADMISSION OF
PAUL A. CAPUA PRO HAC VICE

This matter was considered without hearing on the unopposed motion filed by Alon International, S.A. to admit Paul A. Capua *pro hac vice*. The Court has reviewed the motion and finds good cause for the relief sought. Accordingly, it is

ORDERED and ADJUDGED that the motion is hereby **GRANTED**. Paul A. Capua may appear before this Court *pro hac vice* as counsel for Defendant, Alon International, S.A., in this action, subject to the rules of this Court.

DONE and ORDERED in the District of Massachusetts on this ____ day of June 2005.

HONORABLE PATTI B. SARIS
United States District Judge

Conformed copies sent to:

Jose I. Astigarraga, Esq.
Richard A. Johnston, Esq.
Michael C. Gilleran, Esq.